



State of Ohio Environmental Protection Agency

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George V. Voinovich, Governor
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FILE: _____
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May 9, 1997

RE: DOE-FEMP
HAMILTON COUNTY
HAZARDOUS WASTE

Mr. Bob Danner
U.S. DOE-FEMP
Office of Environmental Management
P.O. Box 538705
Cincinnati, Ohio 45253-8705

Dear Mr. Danner:

This letter is written in response to your faxed request for approval for DOE-FEMP to receive approximately 50 drums of hazardous waste residues from Manufacturing Sciences Corporation (MSC) in Oak Ridge, Tennessee. This waste was generated from an engineering study conducted by MSC on scrap metal originating from the FEMP. DOE-FEMP must receive approval from Ohio EPA prior to receiving any wastes from off-site per the December, 1988 Consent Decree.

Based on information presented in the initial fax and additional information provided in a fax received on May 6, 1997, the Ohio EPA grants approval for DOE-FEMP to receive 54 drums of waste from MSC. DOE-FEMP must comply with all hazardous waste rules applicable to the receipt of this waste.

During initial discussions with you regarding this issue, it appeared that DOE had not explored alternative treatment/disposal options for this waste. (DOE has subsequently submitted information relating to an analysis of alternatives and justification for the return of the residues.) The Ohio EPA understands its obligation to allow for the return of mixed waste treatment residues in order to limit the burden on states that agree to treat waste from Ohio sites. At the same time, the Ohio EPA shares a goal with DOE-FEMP to one day remove all hazardous waste from storage at DOE-FEMP. The return of waste to the FEMP when other more appropriate alternatives exist would be contrary to this goal. Limiting unnecessary return of wastes will also reduce the number of times this material will be handled and transported, thereby reducing the risk associated with these activities. Therefore, the Ohio EPA encourages DOE-FEMP to make every effort to anticipate the generation of mixed waste residues from off-site treatment of wastes, and to determine whether alternatives (such as direct shipment to a TSD) other than the return of these residues to FEMP exist. In order to minimize a possible burden on states that agree to treat waste from Ohio sites, we feel strongly that the evaluation of alternatives should occur expeditiously and prior to the accumulation of treatment residues. The Ohio EPA will continue to consider the return of these residues to FEMP after other alternatives have been evaluated and ruled out.

In light of the concerns expressed above, and in order for future requests of this nature to be processed more expeditiously, the Ohio EPA asks that the following information be included in future requests to receive treatment residuals from off-site.

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1. DOE-FEMP must provide a discussion of the evaluation of alternatives along with justification for receiving this waste back from the treatment facility.
2. DOE-FEMP must provide information indicating specifically where the waste will be stored upon its receipt from the treatment facility.
3. DOE-FEMP must specify the plans for the ultimate treatment and disposal of the returned waste. If these activities will impact FEMP's current Site Treatment Plan, DOE-FEMP must provide a discussion as to how the plan will be impacted.

If there are any questions or concerns, do not hesitate to contact me at 937-285-6079.

Sincerely,



Paul D. Pardi
Group Leader
Division of Hazardous Waste Management

PDP/maw

cc: Tom Winston, Chief, SWDO
Tom Schneider, SWDO-OFFO

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